

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Craig Johnson

Case: 2:24-mj-30395

Case No. Assigned To : Unassigned

Assign. Date : 9/12/2024

Description: COMP USA V.
JOHNSON (KB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 15, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

See attached affidavit.

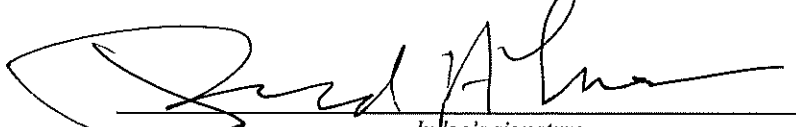
☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 12, 2024City and state: Detroit, MI
Complainant's signature

Richard Cousins, Special Agent ATF

Printed name and title


Judge's signature

Hon. Bernard A. Friedman, U.S. District Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Richard Cousins, being first duly sworn, hereby state:

INTRODUCTION

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) since April 2023. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations and make arrests for offenses enumerated under federal law. I have authored several federal search warrants, federal criminal complaints, and federal arrest warrants.

2. I have had extensive training at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. In addition, prior to my employment with ATF, I was a U.S. Customs and Border Protection Officer with United States Customs and Border Protection, for approximately three years. I also have a bachelor’s degree in political science.

3. I am currently assigned to the ATF Detroit Field Division, where I investigate various federal firearm violations. During my law enforcement career, I have conducted and participated in numerous criminal investigations, including crimes of violence, controlled substances offenses, and firearm violations.

Specifically, I have also investigated violations of Title 18, United States Code, Section 922(g)(1), possession of a firearm by a convicted felon. I also work in conjunction with other ATF agents, who have extensive experience in criminal investigations, including investigations involving firearms, armed drug tracking, and criminal street gangs.

4. This affidavit establishes probable cause that Craig JOHNSON (DOB: XX/XX/1998) has violated Title 18, United States Code, Section 922(g)(1), possession of a firearm by a convicted felon.

5. I make this affidavit based on my participation in this investigation, witness interviews conducted by myself and other law enforcement agents, reports from other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

6. The information in this affidavit is for the limited purpose of establishing probable cause and does not contain all details or all facts known to law enforcement relating to this investigation.

PROBABLE CAUSE

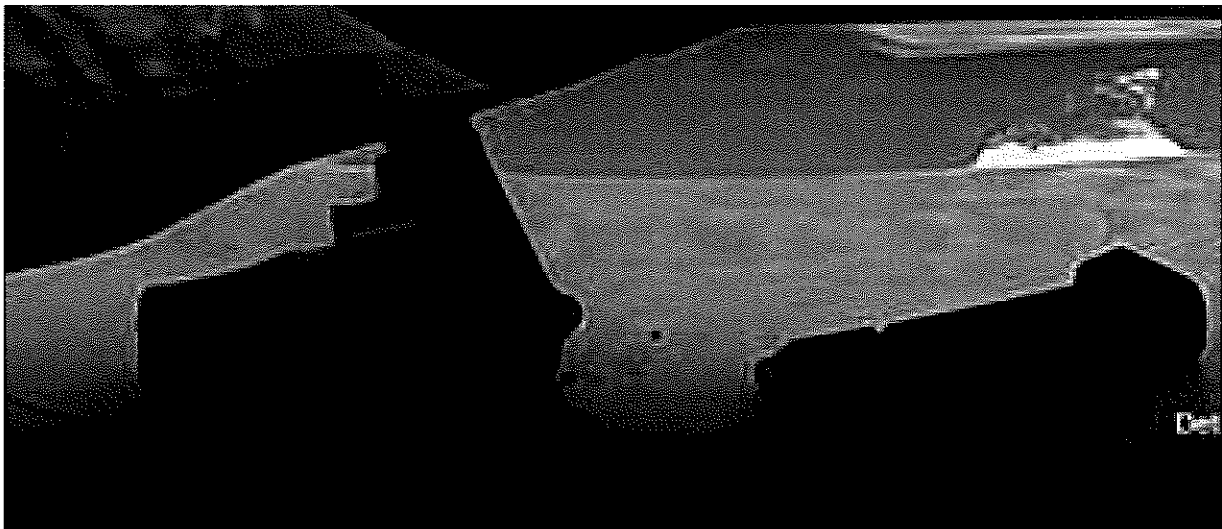
7. On June 15, 2024, at approximately 7:35 p.m., Detroit Police Department (DPD) Officers Nathan Labelle and Tyler Blackburn were traveling in a DPD marked scout unit in the area of Penrose Street in Detroit, Michigan, when

they noticed JOHNSON standing near the corner of Blake Street and Penrose Street with what appeared to be a black handgun partially concealed sticking out of his right front pants pocket.

8. The officers exited their vehicle and observed Johnson, who was standing in the street next to his vehicle, turn his body away from them and begin to walk to towards the other side of his vehicle.

9. Officer Blackburn instructed JOHNSON to stop so officers could investigate further. Officer Blackburn asked JOHNSON if he had a concealed pistol license (CPL) and JOHNSON stated that it was in the car or at home.

10. Officer Blackburn then retrieved the black handgun from Johnson's pocket. The handgun was a black HI-Point JHP .45 caliber pistol bearing serial number X4291429 with an extended magazine. The following photographs show the firearm partially sticking out of JOHNSON'S pants and the firearm after Officer Blackburn retrieved it from JOHNSON:



11. DPD officers utilized the Law Enforcement Information Network (LEIN) to confirm that JOHNSON did not hold a valid CPL. JOHNSON was then transferred to the Detroit Detention Center (DDC).

12. At the time of the arrest, JOHNSON was on parole related to a 2015 conviction for felony carjacking for which he was sentenced to 7-15 years imprisonment. Because JOHNSON served more than 8 years incarceration and was on parole at the time of the arrest, there is probable cause to believe that JOHNSON was aware of his status as a convicted felon when he possessed the HI-Point JHP .45 caliber pistol.

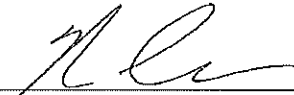
13. On September 4, 2024, I contacted Special Agent Kevin Rambus, an ATF Interstate Nexus Expert, and provided him a verbal description of the black HI-Point JHP .45 caliber pistol bearing serial number X4291429. Based upon the verbal description, Special Agent Rambus advised me that the firearm is a firearm as defined under 18 U.S.C. § 921 and was manufactured outside of the state of Michigan, and therefore, has traveled in and affected interstate commerce.

CONCLUSION

14. Based upon the aforementioned facts, there is probable cause to believe that on June 15, 2024, within the Eastern District of Michigan, Southern Division, Craig JOHNSON, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and

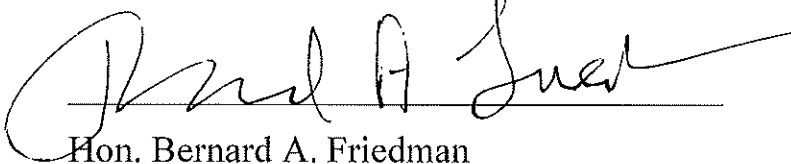
affecting interstate commerce, a firearm, that is one black HI-Point JHP .45 caliber pistol bearing serial number X4291429, in violation of Title 18, United States Code, Section 922(g)(1).

Respectfully submitted,



Richard Cousins, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn and subscribed to before me in my
presence and/or by reliable electronic means.



Hon. Bernard A. Friedman
United States District Judge

Dated: 9/12/24